

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:24-CV-

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	COMPLAINT FOR
	)	FORFEITURE <i>IN REM</i>
\$2,767,919.94 IN PROCEEDS FROM	)	
CURRENCYCLOUD INC ACCOUNT	)	
XXXXXX6592	)	
	)	
Defendant.	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) providing for the forfeiture of property which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1) or a conspiracy to commit such offense, including violations of 18 U.S.C. § 1343 (Wire Fraud); as well as 18 U.S.C. § 981(a)(1)(A) providing for the forfeiture of any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956-57 (Money Laundering), or any property traceable to such property.

2. This Court has subject matter jurisdiction over this matter by virtue of 28 U.S.C. §§ 1355 and 1395(C). The Court has *in rem* jurisdiction by virtue of 28

U.S.C. § 1355(b). Venue in this district is proper by virtue of 28 U.S.C. §§ 1355(b)(a)(A) and 1395(c).

3. The defendant is \$2,767,919.94 contained in Currencycloud Inc. account XXXXXX6592, held in the name of FVB Ltd.

4. The defendant was seized from a financial account established outside the United States and brought into government custody in September 2023. Custody of the defendant is currently located in the Seized Asset Deposit Fund Account maintained by U.S. Department of Treasury, within the jurisdiction of this Court.

5. The potential claimants in this action are the North Carolina Housing Finance Agency, FVB Ltd., and Florina-Victoria Constantinescu

6. The facts and circumstances supporting the seizure and forfeiture of the defendant are contained in Exhibit A, Declaration of Caleb Anderson, Special Agent with the U.S. Secret Service, which is attached hereto and incorporated herein by reference. Such facts constitute probable cause for the seizure, arrest, and forfeiture of the defendant property and are sufficient to support a reasonable belief that the government will meet its burden of proof at trial that the defendant property should be forfeited.

7. The defendant is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

WHEREFORE, in accordance with Supplemental Rule G(3)(b)(i), the plaintiff requests that the Clerk issue a warrant of arrest *in rem* for the defendant; that due notice be given to all parties to appear and show cause why the forfeiture should not

be decreed; that judgment be entered declaring the defendant be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 31st day of January, 2024.

MICHAEL F. EASELY, JR.  
United States Attorney

BY: /s/ Matthew L. Fesak  
MATTHEW L. FESAK  
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## VERIFICATION

I, Caleb Anderson, Special Agent with the U.S. Secret Service, declare under penalty of perjury, as provided by 28 U.S.C. § 1746, that the foregoing Complaint for Forfeiture is based on reports and information known and/or furnished to me and to the best of my information and belief, is true and correct.

This the 24th day of January, 2024.

CANDERSON Digitally signed by CANDERSON  
Date: 2024.01.24 16:07:46  
+05'00'

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Caleb Anderson  
Special Agent  
U.S. Secret Service